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Attorneys for Defendants
UNITED HEALTHCARE INSURANCE COMPANY
and UNITED BEHAVIORAL HEALTH

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

LD, DB, BW, RH, and CJ, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

UNITED HEALTHCARE INSURANCE
COMPANY, a Connecticut Corporation,
UNITED BEHAVIORAL HEALTH, a
California Corporation, and MULTIPLAN,
INC., a New York Corporation,

Defendants.

Case No. 4:20-cv-02254-YGR-JCS

**DECLARATION OF LAUREN M. BLAS IN
SUPPORT OF JOINT LETTER
SUBMISSION REGARDING DISCOVERY
DISPUTE**

Hon. Joseph C. Spero

1 I, Lauren M. Blas, state and declare as follows:

2 1. I am a partner at Gibson, Dunn & Crutcher LLP, and counsel of record for Defendants
3 United Healthcare Insurance Company (“UHC”) and United Behavioral Health (“UBH”) (together,
4 “United Defendants”) in the above-captioned case. I have personal knowledge of the facts set forth
5 in this Declaration, and, if called as a witness, could and would testify competently to such facts
6 under oath.

7 2. I submit this declaration under Local Rule 7-11 in support of United Defendants’
8 Request for Leave to File Exhibit in Support of their Joint Letter Submission Regarding Discovery
9 Dispute. Specifically, United Defendants seek leave to file the Declaration of Rebecca Paradise as an
10 exhibit to the parties’ Joint Letter Submission Regarding Discovery Dispute (Dkt. 120).

11 3. On March 21, 2022, Plaintiffs’ counsel notified counsel for United Defendants via
12 email that they would not agree to file the Declaration of Rebecca Paradise with the parties’ Joint
13 Letter.

14 I declare under penalty of perjury that the foregoing is true and correct.

15 Executed on March 28, 2022.

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17 /s/ Lauren M. Blas

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